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AITAL

**ASOCIACION INTERNACIONAL DE TRANSPORTE AEREO  
LATINOAMERICANO. AITAL**

**POSITION PAPER**

**SECURITY CONSIDERATIONS FOR THE FLIGHT DECK OF FOREIGN  
OPERATED TRANSPORT CATEGORY AIRPLANES**

**FEDERAL REGISTRY CITATION 67 CFR 42449**

**1. Introduction.**

1. As part of the industry, AITAL believes that governments have direct responsibility for aviation security and its funding. This responsibility includes the protection of its citizens in the air and on the ground, as the security threat against airlines is a manifestation of the threat against States.

As such, the provision and cost of aviation security should be borne by the States from general revenues and not from user fees.

2. AITAL believes that States must work together in a co-operative manner, with input from the industry, to ensure harmonized implementation of globally recognized standards based on ICAO Annex 17, Security.

**2. Enhanced Flight Deck Security Options.**

1. AITAL supports the implementation of advanced cockpit door technology capable of securing the flight crew against attack.

2. AITAL also supports, in the longer term and taking into consideration all practical problems, the installation of a surveillance system to allow the flight crew to monitor the access area to the cockpit.

3. AITAL deems it necessary to extend the installation of doors meeting the new standard beyond April 9, 2003 to November 1, 2003 for the following reasons:

a. It is necessary to harmonize the various standards that may be imposed by various governments around the world. In this respect, it is essential to work together within the framework of ICAO. As is publicly known, this organization has set a November 1, 2003 deadline to install such doors.

b. At the FAA estimated average cost of USD 36,000 per door, Latin American carriers need the extended period of time to secure financing. It is worth noting that, despite the industry's deep financial crisis, most Latin American Governments are not providing its carriers any relief or funds to meet the

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enhanced security measures and procedures being implemented throughout the world.

c. The new rule may require additional training for flight crews and the introduction of new procedures. The extended period being requested will allow its effective implementation.

d. AITAL does not believe that granting such additional period of time will make a substantial difference in the fight against terrorism. A uniform worldwide date as that recommended by ICAO will guarantee a global solution, prevent confusing demands by various governments and allow for effective planning, purchasing and installation of the new doors and the introduction of the additional training and procedures the new rule entails.